

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Charles Kenyatta Jr., Pro Se Plaintiff

Collins Correctional Facility
PO Box 340
Collins, NY 14034

1:24-cv-06923-JGK-GS

LETTER TO THE HONORABLE JUDGE JOHN G. KOELTL

01/16/2025

The Honorable John G. Koeltl
United States District Court
500 Pearl Street, Courtroom 14A
New York, New York 10007
Re: **1:24-cv-06923-JGK-GS**

Dear Judge Koeltl,

I am writing respectfully to request the Court's permission to amend my complaint in the above-referenced matter. During the pre-motion conference held on **1/16/2025**, I stated that I did not wish to amend my complaint. However, upon further review of the Defendants' pre-motion letter and consultation with my wife, I have reconsidered and now believe that amending the complaint is in the best interest of justice and necessary to fully address the issues raised by the Defendants.

As I am currently incarcerated, I have not been receiving legal mail that you stated has been filed. I did not receive a full copy of the Defendants' pre-motion letter prior to the conference and was only verbally told. After reviewing the letter over the phone with my wife, I now understand that amending the complaint will allow me to:

1. Provide additional clarity and detail regarding the involvement of Bad Boy Entertainment LLC (BBE) in the infringing activities;
2. Address concerns about the use of my trademarks in commerce, as raised in the Defendants' letter;
3. Strengthen allegations regarding the likelihood of consumer confusion; and
4. Streamline the claims to focus on the strongest legal and factual issues.

I understand the importance of judicial efficiency and assure the Court that this request is made in good faith. I believe that allowing an amendment at this stage will not prejudice the Defendants, as they have not yet filed their motion to dismiss or engaged in discovery. Instead, it will provide clarity and ensure the case proceeds on its merits.

I respectfully request the Court's consideration in granting me leave to file an amended complaint. I am prepared to submit the proposed amended complaint promptly should the Court permit me to do so.

Thank you for your time and attention to this matter.

Respectfully submitted,

Charles Kenyatta

Plaintiff Pro Se
